

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE

POWER INTEGRATIONS, INC., a
Delaware corporation,

Plaintiff,

v.

FAIRCHILD SEMICONDUCTOR
INTERNATIONAL, INC., a Delaware
corporation, and FAIRCHILD
SEMICONDUCTOR CORPORATION, a
Delaware corporation,

Defendants.

C.A. No. 04-1371 JJF

REDACTED

**DECLARATION OF WILLIAM J. MARSDEN, JR. IN SUPPORT OF POWER
INTEGRATIONS, INC.'S COMBINED OPPOSITION TO DEFENDANTS'
MOTION TO ADD PRIOR ART REFERENCES TO THE INVALIDITY TRIAL
AND CROSS-MOTION TO PRECLUDE FAIRCHILD'S UNTIMELY
CONTENTIONS AND DOCUMENTS AT TRIAL**

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POWER INTEGRATIONS, INC.

Dated: November 13, 2006

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I, William J. Marsden, Jr., declare as follows:

1. I am an attorney at Fish & Richardson P.C., counsel of record in this action for Plaintiff Power Integrations, Inc. ("Power Integrations"). I am a member of the Bar of the State of Delaware and of this Court. I have personal knowledge of the matters stated in this declaration and would testify truthfully to them if called upon to do so.
2. Attached hereto as Exhibit A is a true and correct copy of Fairchild's list of seven prior art references, provided to Power Integrations on October 2, 2006.
3. Attached hereto as Exhibit B is a true and correct copy of an excerpt from the transcript of the first day of trial in this case, October 2, 2006. (D.I. 416)
4. Attached hereto as Exhibit C is a true and correct copy of a November 2, 2006 e-mail from Fairchild counsel, Brian VanderZanden, to Power Integrations' counsel, Howard Pollack, regarding Fairchild's new list of prior art references for trial.

5. Attached hereto as Exhibit D is a true and correct copy of an October 20, 2006 letter from Fairchild counsel, Brian VanderZanden, to Power Integrations' counsel, Howard Pollack, enclosing new production documents.

6. Attached hereto as Exhibit E is a true and correct copy of an October 24, 2006 letter from Fairchild counsel, Brian VanderZanden, to Power Integrations' counsel, Howard Pollack, enclosing additional new production documents.

7. Attached hereto as Exhibit F is a true and correct copy of an October 30, 2006 letter from Fairchild counsel, Brian VanderZanden, to Power Integrations' counsel, Howard Pollack, regarding additional new production documents.

8. Attached hereto as Exhibit G is a true and correct copy of an October 26, 2006 letter from Power Integrations' counsel, Howard Pollack, to Fairchild counsel, Brian VanderZanden, regarding Fairchild's untimely production of new documents.

9. Attached hereto as Exhibit H is a true and correct copy of a November 9, 2006 letter from Fairchild counsel, Brian VanderZanden, to Power Integrations' counsel, Howard Pollack, regarding Fairchild's new production documents.

10. Attached hereto as Exhibit I is a true and correct copy of the opening expert report of Fairchild technical expert Dr. Peter Gwozdz, served December 1, 2005.

11. Attached hereto as Exhibit J is a true and correct copy of the "Supplementary" expert report of Fairchild technical expert Dr. Peter Gwozdz, served February 23, 2006.

12. Attached hereto as Exhibit K is a true and correct copy of the opening expert report of Fairchild technical expert Dr. Paul Horowitz, served December 1, 2005.

13. Attached hereto as Exhibit L is a true and correct copy of an excerpt from Fairchild's March 7, 2005 Response to Power Integrations' First Set of Interrogatories containing Fairchild's invalidity contention regarding the SGS-Thompson TEA2262.

14. Attached hereto as Exhibit M is a true and correct copy of an excerpt from Fairchild's June 30, 2005 Supplemental Response to Power Integrations' First Set of

Interrogatories containing Fairchild's invalidity contention regarding the SGS-Thompson TEA2262.

15. Attached hereto as Exhibit N is a true and correct copy of an excerpt from Exhibit 6 to the deposition of Paul Horowitz containing a claim chart regarding Dr. Horowitz's revised invalidity contention regarding the SMP240/260.

16. Attached hereto as Exhibit O is a true and correct copy of an excerpt from the minuscrit of the Videotaped Deposition Transcript of Paul Horowitz, taken on February 4, 2006.

17. Attached hereto as Exhibit P is a true and correct copy of an e-mail from Power Integrations' Vice President of Worldwide Sales, Bruce Renouard, dated October 18, 2006.

18. Attached hereto as Exhibit Q is a true and correct copy of a Fairchild press release dated October 10, 2006.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed this 13th day of November, 2006, at Wilmington, Delaware.

/s/ William J. Marsden, Jr. _____
William J. Marsden, Jr.